TAXPAYERS for COMMON SENSE

March 22, 2023
Re: Comments to the Wildland Fire Mitigation and Management Commission

Via Electronic Form

Taxpayers for Common Sense (TCS) is a nonpartisan budget watchdog that believes in avoiding unnecessary long-term liabilities for taxpayers, in addition to cutting unnecessary subsidies and corporate welfare. TCS seeks to reduce future liabilities from wildfire through better spending decisions. As taxpayers face rising costs from climate change, federal spending should prioritize projects that promote long-term solutions and reduce risks for communities to save taxpayer dollars. This applies to programs ranging from flood insurance to crop insurance to wildfire spending.

In 2000, TCS released *From the Ashes: Reducing the Harmful Effects and Rising Costs of Western Wildfires*. Many of our recommendations still ring true: minimize costs, not fires; evaluate the success of fire prevention by measuring the number of high-risk communities protected, instead of acres treated; encourage state and local governments to set regulations that require homeowners in the wildland urban interface (WUI) to protect their own private property; increase transparency and accountability; and more. In a forthcoming report, TCS builds on this work, examining current federal wildfire appropriations and other spending across the federal government alongside historical perspective, case studies, and policy considerations.

In response to the Commission's request for comments on Appropriations, TCS respectfully submits the following:

1. **Track and Account for Effectiveness of New Funding:** With the massive new wildfire spending in the IIJA and IRA, it is even more important for information on taxpayer spending and the related impacts to be publicly available and readily accessible. Understanding where taxpayer dollars are going geographically, for which programs, and over which timeframes is necessary to evaluate the return on investment.

2. **Reevaluate the Wildfire Reserve Fund:** Congress should update the wildfire suppression operations base level required to tap the Reserve Fund to the rolling 10-year average, instead of FY15 level, and Congress should reevaluate the budgetary structure of the Reserve Fund post-BCA. Congress must also ensure reserve fund transfers are tracked; these records do not appear to be readily available although Congress requires it.

3. **Set Productive Metrics for Success:** We need better metrics, like number of high-risk communities protected, to accurately gauge progress and direct future funding decisions. The USFS is still using number of acres treated to track hazardous fuel reduction progress, despite recent claims that USFS has inflated its progress by double counting the same acres treated by different methods.

4. **Evaluate the USFS Trust Funds**: While the goals of the trust funds have merit, greater oversight and control by Congress is needed to ensure they are managed cost-effectively and responsibly.

5. **Recalibrate Mitigation vs. Suppression Funding:** Mitigation can save property, lives, and tax dollars. Prioritizing suppression funding diverts resources from prevention, risk reduction, and other programs, leading to potentially steeper future suppression costs.

6. **Federal Post-Fire Assistance Should be Conditional:** Federal post-fire assistance should be conditioned on commitments to adopt appropriate zoning, building codes, and landscape management designed to reduce and pre-spond to future fire risks, particularly in the WUI. High-risk communities should disincentive risky developments, invest in fireproofing, and create defensible zones.

7. **Continued Subsidization of Forest Products May Lead to Perverse Incentives**: Subsidies for forest products intended to reduce “hazardous fuel” (e.g., Good Neighbor Authority, stewardship contracts, etc.) might create perverse incentives that increase fire risks, since the locations of forest products harvests rely on factors that may misalign with wildfire spatial patterns or even undermine overall forest health.